

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS))	Master File No.: 12-md-02311
ANTITRUST LITIGATION)	Honorable Marianne O. Battani
)	Special Master Gene J. Esshaki
In Re: All Auto Parts Cases))	2:12-MD-02311-MOB-MKM
)	
THIS DOCUMENT RELATES TO:)	
ALL AUTO PARTS CASES)	

**NON-PARTY TOYOTA'S EX PARTE MOTION FOR LEAVE
TO EXTEND PAGE LIMIT OF RESPONSE TO
THE PARTIES' RENEWED MOTION TO COMPEL**

Non-parties Toyota Motor Sales USA, Inc. (“TMS”) and Toyota Motor Engineering & Manufacturing North America, Inc. (“TEMA”) (together, “Toyota”), by its attorneys, submits this *Ex Parte* Motion For Leave To Extend Page Limit Of Toyota's Response to the Parties' Renewed Motion to Compel. Toyota respectfully requests that the Court grant this Motion for the following reasons:

1. Toyota along with a number of other original equipment manufacturers (“OEMs”), received an incredibly broad subpoena from the Parties¹ in this litigation in July 2015, seeking essentially all information about Toyota's business and operations for the last 23 years.
2. Following extensive discovery regarding available data and documents and the burdens associated with collection and production, Toyota offered substantial productions of data and documents from TMS and TEMA.

¹ The Parties include the end-payor plaintiffs (“EPPs”), auto dealer plaintiffs (“ADPs”), and defendants.

3. Despite Toyota's offered productions, the Parties have now renewed their motion to compel production from Toyota to which Toyota opposes and seeks to file a Response to the Parties Renewed Motion to Compel.

4. This Court's Motion Practice Guidelines state motion responses are allowed a maximum of twenty (20) pages.

5. Toyota respectfully requests that the Court set the maximum page-limit of twenty-five (25) pages, including footnotes and signatures, for Toyota's Response to the Parties' Renewed Motion to Compel so that Toyota has the opportunity to adequately respond to the numerous assertions and cases cited in the Parties' Renewed Motion to Compel.

WHEREFORE, Toyota respectfully requests that this Court grant its Ex Parte Motion For Leave To Extend Page Limit Of Toyota's Response to the Parties' Renewed Motion to Compel and set the maximum page limit of twenty-five (25) pages, including footnotes and signatures, for Toyota's Response Brief.

Dated: November 22, 2016

Respectfully Submitted,

By: /s/ Michael Schaper
Michael Schaper
David B. Noland
DEBEVOISE & PLIMPTON LLP
919 Third Ave
New York, NY 10022
Tel: 212-909-6000
mschaper@debevoise.com

Thomas P. Branigan (P41774)
BOWMAN & BROOKE LLP
41000 Woodward Avenue,
Ste. 200 East
Bloomfield Hills, MI 48304
Tel: 248-205-3300
tom.branigan@bowmanandbrooke.com

Attorneys for Toyota Motor Sales USA, Inc.
and Toyota Motor Engineering &
Manufacturing North America, Inc.

CERTIFICATE OF SERVICE

I certify that on November 22, 2016, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to attorney

Respectfully Submitted,

By: /s/ Michael Schaper
Michael Schaper
David B. Noland
DEBEVOISE & PLIMPTON LLP
919 Third Ave
New York, NY 10022
Tel: 212-909-6000
mschaper@debevoise.com

Thomas P. Branigan (P41774)
BOWMAN & BROOKE LLP
41000 Woodward Avenue,
Ste. 200 East
Bloomfield Hills, MI 48304
Tel: 248-205-3300
tom.branigan@bowmanandbrooke.com
Attorneys for Toyota Motor Sales USA, Inc.
and Toyota Motor Engineering &
Manufacturing North America, Inc.